

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Trustee,

v.

NATIXIS, NATIXIS CORPORATE &  
INVESTMENT BANK (f/k/a IXIS  
CORPORATE & INVESTMENT BANK),  
NATIXIS FINANCIAL PRODUCTS, INC.,  
BLOOM ASSET HOLDINGS FUND, and  
TENSYR LIMITED,  
Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05353 (SMB)

**SO-ORDERED STIPULATION EXTENDING TIME TO  
RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Trustee may respond to the Motions to Dismiss filed by Defendant Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) (“Natixis FP”) is extended up to and including August 18, 2017. It is further stipulated and agreed that Natixis FP shall file its reply by November 10, 2017.

The pre-trial conference will be adjourned from October 25, 2017 at 10:00 a.m. to December 20, 2017 at 10:00 a.m. The return date for this matter was previously set for September 27, 2017 at 10:00 a.m. but will be rescheduled for November 29, 2017 at 10:00 a.m.

The purpose of this stipulated extension (the “Stipulation”) is to provide adequate time for the Trustee to seek resolution of a protocol going forward as to the remaining claims against Natixis FP (certain of the claims having been dismissed by the Court’s Order, dated March 9, 2017 [ECF No. 129]).

The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee and Natixis FP may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: June 6, 2017  
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Catherine E. Woltering  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Catherine E. Woltering  
Email: cwoltering@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the estate  
of Bernard L. Madoff*

DAVIS & GILBERT LLP

By: /s/ James R. Serritella  
1740 Broadway  
New York, New York 10019  
Telephone: (212) 468-4800  
Facsimile: (212) 468-4888  
Joseph Cioffi  
Email: jcioffi@dglaw.com  
Bruce M. Ginsberg  
Email: bginsberg@dglaw.com  
James R. Serritella  
Email: jserritella@dglaw.com

*Attorneys for Defendant Natixis Financial  
Products LLC (as successor in interest to  
Natixis Financial Products Inc.)*

**SO ORDERED**

Dated: June 7<sup>th</sup>, 2017  
New York, New York

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE